

Jason M. Drangel (JD 7204)  
[jdrangel@ipcounselors.com](mailto:jdrangel@ipcounselors.com)  
Ashly E. Sands (AS 7715)  
[asands@ipcounselors.com](mailto:asands@ipcounselors.com)  
Brieanne Scully (BS 3711)  
[bscully@ipcounselors.com](mailto:bscully@ipcounselors.com)  
Danielle S. Yamali (DY 4228)  
[dfutterman@ipcounselors.com](mailto:dfutterman@ipcounselors.com)  
EPSTEIN DRANGEL LLP  
60 East 42<sup>nd</sup> Street, Suite 2520  
New York, NY 10165  
Telephone: (212) 292-5390  
Facsimile: (212) 292-5391  
*Attorneys for Plaintiffs*  
*Palace Skateboards Group and*  
*GSLT Holdings Limited*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PALACE SKATEBOARDS GROUP and GSLT  
HOLDINGS LIMITED,

*Plaintiffs*

v.

A5DHGATES, BEIDHGATE,  
BRANDFACTORYSELLER, BUFEN, BUSHU,  
BUYCHEAPDOORS, BUYLINNIAOS,  
CJJDHGATEBAGS, DHGATEJJJ,  
DHGATEYUNWAN, EXTREMELY\_COLD\_PLACE,  
FENGXIDHGATE, FUSHANCHEN,  
GOODSUGOODS, GUOZHENDHGATE,  
HONESTTRADE688, JAMYDHHATEUUS,  
JDELECTRONIC6, JJKINGS, JUBU, LING16888,  
LING1888, LING188866, LUANDHGATES,  
MIMIKU, MMDHGATES, NEWCLOTHESJJ,  
NEWTIMESDHGATES, PPDHGATES, QIYUE02,  
SONGDHGATES, TAOBAO INTERNATIONAL,  
TOM\_COSTUME, XDHGATESX and YDHGATEYS,

*Defendants*

Civil Case No.: 21-cv-3949 (LAK)

~~PROPOSED~~

**1) TEMPORARY RESTRAINING  
ORDER; 2) ORDER RESTRAINING  
MERCHANT STOREFRONTS AND  
DEFENDANTS' ASSETS WITH  
THE FINANCIAL INSTITUTIONS;  
3) ORDER TO SHOW CAUSE WHY  
A PRELIMINARY INJUNCTION  
SHOULD NOT ISSUE; 4) ORDER  
AUTHORIZING BIFURCATED  
AND ALTERNATIVE SERVICE;  
AND 5) ORDER AUTHORIZING  
EXPEDITED DISCOVERY**

**FILED UNDER SEAL**

- c. the nature of Defendants' businesses and operations, methods of payment, methods for accepting payment and any and all financial information, including, but not limited to, information associated with Defendants' User Accounts and Defendants' Merchant Storefronts, a full accounting of Defendants' sales history and listing history under such accounts and Defendants' Financial Accounts with any and all Financial Institutions associated with Defendants' User Accounts and Defendants' Merchant Storefronts; and
- d. Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling of Counterfeit Products, or any other products bearing the Palace Marks and/or marks that are confusingly similar to, identical to and constitute an infringement of the Palace Marks.

**VI. Security Bond**

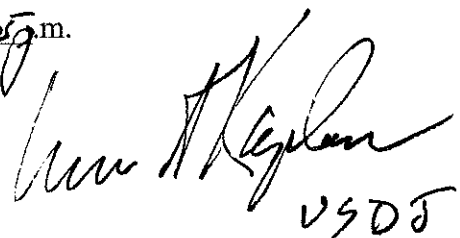
- A. IT IS FURTHER ORDERED that Plaintiffs shall place security in the amount of Ten thousand Dollars (\$10,000) with the Court which amount is determined adequate for the payment of any damages any person may be entitled to recover as a result of an improper or wrongful restraint ordered hereunder.

**VII. Sealing Order**

- A. IT IS FURTHER ORDERED that Plaintiffs' Complaint and exhibits attached thereto, and Plaintiffs' *ex parte* Application and the Declarations Thomas Hussey and Jason M. Drangel in support thereof and exhibits attached thereto and this Order shall remain sealed until further order.

**SO ORDERED.**

SIGNED this 20<sup>th</sup> day of May, 2021, at 5:05 p.m.

  
USDB